From:	Yu, Olivia, EMNRD
To:	<u>"Tucker, Shelly"; LovelyTaylor, Kayla</u>
Cc:	Hernandez, Christina, EMNRD; Goates, R. Neal; Pope, Gregory; Wells, Todd
Subject:	RE: [EXT] Re: [EXTERNAL] RE: ConocoPhillips - MCA 1C Trunkline - Work Plan 1RP-5141
Date:	Friday, October 5, 2018 9:38:00 AM
Attachments:	approved_remed_1RP5141.pdf

Good morning Ms. Taylor:

Thank you for your patience and pardon for the delayed response. NMOCD approves of the revised remediation plan for 1RP-5141.

Olivia

From: Tucker, Shelly <stucker@blm.gov>
Sent: Friday, September 28, 2018 3:13 PM
To: LovelyTaylor, Kayla <Kayla.LovelyTaylor@tetratech.com>
Cc: Yu, Olivia, EMNRD <Olivia.Yu@state.nm.us>; Hernandez, Christina, EMNRD
<Christina.Hernandez@state.nm.us>; Goates, R. Neal <N.Goates@conocophillips.com>; Pope,
Gregory <Greg.Pope@tetratech.com>; Wells, Todd <Todd.Wells@tetratech.com>
Subject: [EXT] Re: [EXTERNAL] RE: ConocoPhillips - MCA 1C Trunkline - Work Plan 1RP-5141

## BLM has no issue with you removing the extra impacted material and laying a liner. Please reseed with BLM LPC/HEA seed mix.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely, Shelly J Tucker

Environmental Protection Specialist O&G Spill/Release Coordinator

575.234.5905 - Direct 575.361.0084 - Cellular 575.234.6235 - Emergency Spill Number

stucker@blm.gov

**Bureau of Land Management** 620 E. Greene St Carlsbad, NM 88220

The **BLM acceptance/approval does not** relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment or if the location fails to reclaim properly. <u>In such an event a site does not achieve successful restoration, or future issues with</u> <u>contaminants are encountered, the operator will be asked to address these issues until they are fully mitigated and the</u> <u>location is successfully reclaimed</u>. In addition, BLM approval does not relieve the operator of responsibility for compliance with any other federal, state or local laws/regulations.

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this communication in error, please notify the sender immediately.

## **NOTE:** LPC Timing Stipulations - from **March 1st through June 15th**. Please plan remedial activities accordingly. Check for African Rue...treat (before it gets out of control).

On Thu, Sep 6, 2018 at 4:10 PM LovelyTaylor, Kayla <<u>Kayla.LovelyTaylor@tetratech.com</u>> wrote:

Ms. Yu and Ms. Tucker,

We completed the initial excavation outlined in the approved work plan for MCA 1C truckline, with the exception of the excavation bottom is currently at 6 feet below ground surface. The approved workplan anticipated 5 feet below ground surface. Sidewall samples and bottom hole confirmation samples were collected. The attached table summarizes the data from analytical packet L1021250. The GPS points correlate with the in field use map outlining sample points and current excavation area.

Based on the data, the sidewall samples were below the RRALs and recommended chloride concentration. The two bottom hole samples (AH-1 and AH-2) were collected at 6 feet below ground surface. Due to the staining, the areas were potholed with the backhoe bucket and a sample was also collect at each location at 7 feet below ground surface to aid in potential delineation. The samples collected at AH-1 showed chloride concentrations that exceed the recommended 600 mg/kg limit. The samples collected at AH-2 documented chloride concentrations that exceeded 600 mg/kg at 6 and 7 feet below ground surface. In addition, the sample collected at AH-2 at 6 feet below ground surface reported total TPH and total BTEX exceedances but were greatly reduced and below the RRALs.

Tetra Tech is requesting the southern portion of the excavation deepen to 7 feet below surface to remove the TPH and BTEX constituents, and a liner be installed at the bottom of the excavation to prevent the further leaching of chlorides.

If you concur, Tetra Tech will complete this next phase, followed by backfilling operations and revegetation according to BLM specification.

Please let me know if you have any questions or further recommendations.

Kayla Taylor | Geologist Direct Office: 432.687.8143 | Cell: 432.210.5443 kayla.lovelytaylor@tetratech.com

Tetra Tech OGA | Complex World, Clear Solutions™ 901 W. Wall Street., Suite 100 | Midland, TX 79701 | www.tetratech.com

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From: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>

Sent: Friday, August 3, 2018 8:40 AM

**To:** LovelyTaylor, Kayla <<u>Kayla.LovelyTaylor@tetratech.com</u>>; Tucker, Shelly (<u>stucker@blm.gov</u>) <<u>stucker@blm.gov</u>>; Hernandez, Christina, EMNRD <<u>Christina.Hernandez@state.nm.us</u>>; Tucker, Shelly <<u>stucker@blm.gov</u>>

**Cc:** Goates, R. Neal <<u>N.Goates@conocophillips.com</u>>; Pope, Gregory

<<u>Greg.Pope@tetratech.com</u>>; Wells, Todd <<u>Todd.Wells@tetratech.com</u>>

Subject: RE: ConocoPhillips - MCA 1C Trunkline - Work Plan 1RP-5141

Good morning Ms. Taylor:

Notes

- Based on the GPS coordinates provided, the release occurred in Unit Letter M, not P, of Section 20-17S-32E.
- NMOCD database indicates Federal surface and mineral ownerships. Please remember to include BLM in all communications and submittals.

Thank you for the follow-up and your patience. Please be advised that this release occurred during a period, when there was no Environmental Specialist in District 1 and thus, somehow did not get processed. The pertinent information has been added to the initial C-141 provided in Appendix A. This release has been assigned 1RP-5141.

NMOCD approves of the delineation completed for 1RP-5141. The proposed remediation plan is also approved with one stipulation: confirmation bottom and sidewall samples of the excavated area. In the subsequent remediation/closure report, please include 1) a scaled map with the excavated area and confirmation samples demarcated with GPS coordinates; 2) soil bore logs; and 3) dated photo documentation of remedial activities.

Please confirm or inform for clarifications.

Like approval from BLM required.

Thanks,

Olivia Yu Environmental Specialist NMOCD, District I <u>Olivia.yu@state.nm.us</u> 575-393-6161 x113 OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

From: LovelyTaylor, Kayla <<u>Kayla.LovelyTaylor@tetratech.com</u>>
Sent: Friday, July 20, 2018 9:46 AM
To: Yu, Olivia, EMNRD <<u>Olivia.Yu@state.nm.us</u>>; Tucker, Shelly (<u>stucker@blm.gov</u>)
<<u>stucker@blm.gov</u>>
Cc: Goates, R. Neal <<u>N.Goates@conocophillips.com</u>>; Pope, Gregory
<<u>Greg.Pope@tetratech.com</u>>; Wells, Todd <<u>Todd.Wells@tetratech.com</u>>
Subject: RE: ConocoPhillips - MCA 1C Trunkline - Work Plan 1RP####

Good morning,

I was just following up concerning the status of this work plan.

Please let me know if you have any questions or comments.

Thanks!

We are moving to our new offices on July 30<sup>th</sup> and our new address will be 901 West Wall, Suite 100, Midland, Tx 79701

Kayla TaylorGeologistDirect Office:432.687.8143 | Cell:432.210.5443 | Fax : 432.682.3946kayla.lovelytaylor@tetratech.com

Tetra Tech OGA | Complex World, Clear Solutions™ 4000 N. Big Spring St., Suite 401 | Midland, TX 79705 | <u>www.tetratech.com</u>

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From: LovelyTaylor, Kayla Sent: Tuesday, July 3, 2018 4:35 PM To: 'Yu, Olivia, EMNRD' <<u>Olivia.Yu@state.nm.us</u>>; Tucker, Shelly (<u>stucker@blm.gov</u>)
 <<u>stucker@blm.gov</u>>
 Cc: 'Goates, R. Neal' <<u>N.Goates@conocophillips.com</u>>; Pope, Gregory
 <<u>Greg.Pope@tetratech.com</u>>; Wells, Todd <<u>Todd.Wells@tetratech.com</u>>
 Subject: ConocoPhillips - MCA 1C Trunkline - Work Plan 1RP####

Ms. Yu and Ms. Tucker,

Please find attached the Work Plan for the above referenced ConocoPhillips site, MCA 1C Trunkline. I was unable to locate the 1RP# for this site. If you could identify and provide, it would be very appreciated. This document is being submitted for your review and approval. If in agreement, Tetra Tech will proceed with the described remedial action. Please call or reply to this email with any questions or comments.

Thank you,

Kayla Taylor | Geologist Direct Office: 432.687.8143 | Cell: 432.210.5443 | Fax : 432.682.3946 kayla.lovelytaylor@tetratech.com

Tetra Tech OGA | Complex World, Clear Solutions<sup>™</sup> 4000 N. Big Spring St., Suite 401 | Midland, TX 79705 | <u>www.tetratech.com</u>

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